## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



April 20, 2011

Susan J. Nelson, AIA Regulatory Affairs Southern California Edison 2244 Walnut Grove Avenue, Quad 3D, GO1 Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Variance Request (VR) #56

Dear Ms. Nelson,

On April 13, 2011, Southern Californian Edison (SCE) submitted a variance request to allow for the installation of temporary power poles from the Angeles Forest Highway to the Vincent South Material Yard to provide power to the Vincent South and Vincent North Material Yards, which are used to store material for Segments 6 and 11 Transmission Lines (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Los Angeles County, California. This Variance Request is approved by CPUC based on the following factors:

SCE submitted the following information:

SCE submitted a request for a Variance to allow for the installation of temporary power from the Angeles Forest Highway to the Vincent South Material Yard to provide power to the Vincent South and Vincent North Material Yards, which are used to store material for Segments 6 and 11 Transmission Lines (T/L) of the TRTP in Los Angeles County, California.

Section Site Facilities/Activities of the Notice to Proceed Request (NTPR) (NTP #22 dated December 9, 2010) for the Vincent South Yard identifies that "proposed activities at the Vincent South Yard" include "installation of temporary power." At the time the NTPR was prepared, the feeder location from which temporary power would be supplied to the yard had not been determined. Subsequently, determination has been made that existing pole 4587497E, located on Angeles Forest Highway, would be used as the "bootlegger" from which to provide temporary power to the Vincent South Material Storage Yard. Installation of temporary power will require the placement of several temporary wood power poles outside the boundary of the Vincent South Material Yard and pole 4587497E, from which to string temporary power to the Vincent South Material Yard.

Biological Resources: SCE submitted a biological report by ICF International dated April 11, 2011, titled Biological Survey Report for the Proposed Temporary Power Area Variance for Tehachapi Renewable Transmission Project, Vincent North Material Yard and Vincent South Material Yard, Los Angeles County, California. The report documents the biological conditions within the proposed temporary power area (Variance Project Component) and a 500-foot buffer (Biological Study Area [BSA]) located between Carson Mesa Road and Angeles Forest Highway. The biological resources within the Variance Project Component site and BSA were evaluated during general preconstruction surveys associated with the Vincent North and Vincent South Material Storage Yards (ICF 2011m, 2011n). Biological resources in the area also were evaluated during several focused surveys, including plant (ICF 2010ag), tree inventory (ICF 2010bf), focused burrowing owl (ICF 2010ac), and a preconstruction special-status bat habitat assessment (ICF 2010fk, 2010fl).

The Variance Project Component is composed of disturbed/developed and Mojave mixed woody scrub vegetation. Vegetation communities observed within the BSA include: Mojavean juniper woodland scrub, disturbed Mojavean juniper woodland scrub, Mojave mixed woody scrub, and disturbed/developed habitat. Impacts to Mojave mixed woody scrub would be avoided to the extent possible. No special-status plants have been identified within the Variance Project Component or BSA. The 500-foot BSA for the Variance Project Component supports San Diego desert woodrat potential middens (ICF 2011m, 2011n), and four inactive nests. A loggerhead shrike was observed near the western boundary of the BSA, and numerous potential burrowing owl features (no birds observed) were also detected within the BSA, but not within the proposed temporary power area (ICF 2010fn, 2010fm, 2011bk, 2011bj). Focused habitat assessments for special-status bats (ICF 2010fk, 2010fl) determined that no suitable solitary or colonial roosting bat habitat exist within the proposed temporary power area. No additional impacts to biological resources are anticipated with the implementation of this Variance.

Cultural and Paleontological Resources: SCE submitted a letter with their Variance Request from Pacific Legacy dated April 8, 2011 regarding the Cultural Resources Survey and Paleontological Resources Assessment Letter Report for the Vincent Temporary Power Line Variance, Segment 6, Tehachapi Renewable Transmission Project, Los Angeles County, California. A cultural resources records search was previously conducted, and recently updated, for the TRTP project area which encompasses the current sturdy area (Pacific Legacy 2007; Pacific Legacy 2010d). Results of the records search indicated that one (1) prehistoric archaeological site, 11 historical archaeological sites, 4 historical archaeological isolates, 3 prehistoric archaeological isolates and 7 historical built environment resources are recorded within one mile of the Vincent Temporary Power Line; however, these resources are not located within the Area of Direct Effect (ADE) or the Area of Potential Effect (APE) of the proposed temporary power installation areas.

The previously unsurveyed area of the Vincent Temporary Power Line was surveyed for cultural resources by Pacific Legacy archaeologists, Wayne Bischoff, Ph.D. and Jack Sprague on March 31, 2011. The field survey was conducted by walking along the proposed power line and a 50-foot buffer on each side of the centerline of the line in transects spaced at sever (7) to ten (10) meters apart. Ground visibility was poor (30-40%). Vegetation consisted of dense seasonal grasses interspersed with junipers. One historical archaeological site, designated PL-SCE-SEG6-07, was discovered within the ADE. The site was recorded using standard DPR site record forms, and archaeological testing was performed following the procedures of the TRTP Isolated Historic Refuse Deposit Determination of Eligibility (Appendix K). No subsurface deposits were encountered and the site has been determined not eligible for inclusion on the National Register of Historic Places.

Based on these findings, the installation of the Vincent Temporary Power Line will have no impact to significant cultural resources or historic properties. No additional archaeological assessments are required at this time unless project plans undergo such changes as to include areas not covered by this study or changes to the proposed scope of work. Ground disturbance, and vehicle ingress and egress, are not permitted outside of the proposed power line disturbance areas.

The Paleontological Resources Management Plan Segments 4 though 11 of the TRTP (PRMP) area was prepared by Cogstone Resource Management Inc. (Gust and Scott 2009). The surface sediments (Quaternary Alluvium) have low sensitivity for paleontological resources. Therefore, monitoring by a qualified paleontologist is not required during the proposed ground-disturbance activities.

No additional impacts to cultural or paleontological resources are anticipated with the implementation of this Variance.

## The conditions noted below shall be met by SCE and its contractors:

- All conditions required by Notice to Proceed (NTP) #22 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #22, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

John Boccio

CPUC Environmental Project Manager

cc: V. Strong, Aspen